

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: SORIN 3T HEATER-COOLER : MDL DOCKET NO. 2816
 SYSTEM PRODUCTS LIABILITY : Civil Action No. 1:18-MD-2816
 LITIGATION (NO. II) :
 : Judge Karoline Mehalchick
 This Document Relates To: :
 :
Maloney v. LivaNova Deutschland GmbH, :
et al., :
 Case No. 1:22-cv-01441-KM :
 D. Minn. Case No. 0:22-cv-02008 :

**JOINT DESIGNATION OF GENERAL AND CASE-SPECIFIC MDL RECORDS
TO BE INCLUDED UPON REMAND**

The parties jointly designate all documents from the docket of In Re: Sorin 3T Heater-Cooler System Products Liability Litigation, *Maloney v. LivaNova PLC et al.*, Case No. 1:22-cv-01441-KM to be included in the record on remand.

The parties further jointly designate the following general documents from the docket in MDL No. 2740 (1:18-MD-02816) to be included in the record on remand:

EXHIBIT A: TRANSFER ORDERS				
No.	Date Filed	Dock. No.	Brief Description	Page #
1	02/01/2018	1	Transfer Order coordinating pretrial proceedings for cases involving the Sorin 3T heater-cooler system in MDL 2816 in the Middle District of Pennsylvania	1
2	08/29/2022	518	Conditional Transfer Order 42 transferring the <i>Maloney</i> case to the MDL	

EXHIBIT B: PRETRIAL ORDERS				
No.	Date Filed	Dock. No.	Brief Description	Page #
1	07/31/2018	105	Order Regarding Plaintiff's and Defendants' Fact Sheets and Service Protocol	1
2	07/31/2018	106	Plaintiff Fact Sheet	

EXHIBIT B: PRETRIAL ORDERS				
No.	Date Filed	Dock. No.	Brief Description	Page #
3	07/31/2018	107	Defendant Fact Sheet	
4	08/02/2018	113	Stipulated Protective Order with attachment	
5	10/16/2018	180	Order re 178 adopting Joint Status Report on Proceedings	
6	03/27/2019	245	Order Notice of Voluntary Dismissal	
7	06/03/2019	258	Order Granting Motion to Establish Qualified Settlement Fund	
8	02/26/2020	396	Order- Briefing Schedule	
9	07/23/2021	472	Order Reassigning Litigation	
10	01/15/2025	537	Order Reassigning Litigation	

EXHIBIT C: CASE MANAGEMENT ORDERS				
No.	Date Filed	Dock. No.	Brief Description	Page #
1	02/09/2018	4	Amended Case Management Order No. 1	1
2	02/26/2018	7	Case Management Order No. 2: Initial Case Management Conference	
3	05/31/2018	57	Case Management Order No. 3	
4	06/04/2018	60	Case Management Order No. 4: Post Initial Case Management Conference	
5	06/19/2018	68	Case Management Order No. 5: Establishing Common Benefit Fee and Expense Fund	
6	06/29/2018	74	Case Management Order No. 6	
7	07/09/2018	81	Case Management Order No. 7: Lift Discovery Stay and Sealing Procedure	

EXHIBIT C: CASE MANAGEMENT ORDERS				
No.	Date Filed	Dock. No.	Brief Description	Page #
8	07/09/2018	82	Case Management Order No. 8: Coordination Letter to State Judges	
9	07/10/2018	86	Case Management Order No. 9: Establishing Obligations to Plaintiffs' Leadership Group	
10	07/10/2018	87	Case Management Order No. 10: Establishing State Court Liaison Committee	
11	07/10/2018	114	Case Management Order No. 11: Granting Sealing Filing Privileges	
12	12/03/2018	201	Case Management Order No. 13: Appointing Settlement Master	
13	03/04/2019	236	Case Management Order No. 14	
14	04/16/2019	250	Case Management Order No. 15	
15	01/22/2020	378	Case Management Order No. 16: Granting Sealed Filing Privileges	
16	07/20/2021	470	Amended Case Management Order No. 15	

EXHIBIT D: CASE MANAGEMENT PLANS				
No.	Date Filed	Dock. No.	Brief Description	Page #
1	05/16/2018	37	Joint Proposed Case Management Plan	1
2	06/19/2018	67	Revised Joint Case Management Plan	
3	10/12/2018	178	Joint Status Report on Proceedings	
4	02/28/2019	235	Joint Proposed Case Management Plan with attachment	

The parties further agree and stipulate that, subject to the Court's approval, if any party believes a relevant document was inadvertently not included in the above list, the parties may confer and jointly supplement this joint designation without requesting a hearing or a motion to supplement. Further, the

document designations are intended to incorporate and include all exhibits or attachments that accompanied the documents as filed. Finally, the above-mentioned designations may have been incorporated at the request of one or both parties; accordingly, by agreeing to submission of this set of Joint Designations, the parties reserve their rights to present arguments at a later date following transfer of the relevance and/or precedential value, if any, of the referenced designations.

Dated: 6/30/2025

<p>By: <u>/s/ David Szerlag</u> David Szerlag (MN #034476X) Raymond Trueblood-Konz (MN # 0391236) Alicia Penner (MN # 0401953) 100 University Ave SE Minneapolis, MN 55414 P: (612) 338-0202 F: (612) 338-0104 Email: david@pritzkerlaw.com Email: raymond@pritzkerlaw.com Email: alicia@pritzkerlaw.com Attorneys for Plaintiff</p>	<p><u>/s/ Jared B. Briant</u> Jared B. Briant (CO # 35773) Faegre Drinker Biddle & Reath LLP 1144 Fifteenth Street Suite 3400 Denver, CO 80202-2569 Telephone: 303-607-3500 Facsimile: 303-607-3600 jared.briant@faegredrinker.com Attorney for Defendants</p>
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CERTIFICATE OF SERVICE

I hereby certify that on **June 30, 2025**, I electronically filed the foregoing with the Clerk using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in the member cases.

/s/ David Szerlag